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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
MAR 13 2018  
SEAN P. McAVOY, CLERK  
DEPUTY  
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

**1:18-CR-2016-LRS**

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

Vio: 18 U.S.C. §§ 113(a)(3), 1153 –  
Crime on Indian Reservation, Assault  
with a Dangerous Weapon (Count 1)

v.

Vio: 18 U.S.C. § 924(c)(1)(A) –  
Discharge of a Firearm During a Crime of  
Violence (Count 2)

RAYMOND ZACK GUERRERO-  
GARCIA,

Defendant.

The Grand Jury charges that:

COUNT 1

On or about May 18, 2017, in the Eastern District of Washington, within the external boundaries of the Yakama Nation Indian Reservation, in Indian Country, the Defendant, RAYMOND ZACK GUERRERO-GARCIA, an Indian, did assault P.R. with a dangerous weapon, to wit, a firearm, with intent to do bodily harm, in violation of 18 U.S.C. §§ 113(a)(3), 1153.

COUNT 2

On or about May 18, 2017, in the Eastern District of Washington, within the external boundaries of the Yakama Nation Indian Reservation, in Indian Country, the Defendant, RAYMOND ZACK GUERRERO-GARCIA, an Indian, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for


1 which he may be prosecuted in a court of the United States, to wit: Assault with a  
2 Dangerous Weapon, in violation of 18 U.S.C. §§ 113(a)(3), 1153, as charged in Count  
3 One, all in violation of 18 U.S.C. § 924(c)(1)(A)(iii).

4  
5 DATED this 13th day of March, 2018.

6  
7 A TRUE BILL

8  
9 Presiding Juror

10 JOSEPH H. HARRINGTON  
11 United States Attorney

12   
13 Thomas J. Hanlon  
14 Assistant United States Attorney